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PROTECTING PEOPLE AND THE PLANET

January 21, 2020

Via ECF

Hon. Roanne L. Mann  
Chief Magistrate Judge  
United States District Court  
For the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Joint Status Update; *Suffolk County Water Authority v. The Dow Chemical Company et al.*, No. 2:17-cv-6980-NG-RLM, and Related Cases**

Dear Judge Mann:

Pursuant to the Court's December 10, 2019 Order, the Parties submit this Joint Status letter describing the progress that has been made since the December 10, 2019 conference.

The Parties continue to make progress toward resolving any issues relating to the preliminary fact sheet responses and productions that were made on November 26, 2019. The Parties shall serve their first sets of Requests for Production and Interrogatories this week,<sup>1</sup> and are coordinating on service of first wave third-party document subpoenas. The Parties plan to meet and confer in the coming weeks to discuss, among other things, their expectations for how long document discovery will take, and will be prepared to discuss scheduling with the Court at the already-scheduled April 15, 2020 conference. To the extent the Parties need the Court's guidance on discovery issues before the April 15 conference, they intend to raise those issues by Motion.

Respectfully submitted,

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<sup>1</sup> No discovery has yet taken place in the related case, *Hicksville Water District v. The Dow Chemical Company et al.* (19-cv-05632). Therefore, this plaintiff reserves the right to serve its discovery demands and responses after the date set for the filing of its Fact Sheet response.

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<sup>2</sup> The Sher Edling firm represents all Plaintiffs in these related cases except Plaintiffs New York American Water (19-cv-2150) and Hicksville Water District (19-cv-5632).

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